

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SHAW-NAE DIXON, THOMAS CASATELLI,
JEANETTE RIVERA, NATALIA YAKUBOVA,
CHRIS KING, ALISON MARCHESE, on behalf
of AM, JM, and MMV (her minor children),
WILLIAM MORRIS, GEORGE KABBEZ,
SHAW-NAE'S HOUSE, LLC, SALTY DOG
RESTAURANT, LTD, PER TAVERN CORP.
d/b/a THE KETTLE BLACK, CARGOSTORK
PARTIES, INC. d/b/a DO ME A FAVOR, and
INDEPENDENT RESTAURANT OWNERS
ASSOCIATION RESCUE, INC.,

Plaintiffs,

v.

ERIC ADAMS, in his official capacity as Mayor
of the City of New York and as successor to Bill
de Blasio, and THE CITY OF NEW YORK,

Defendants.

Civil Action No. 21-CV-5090 (BMC)

**NOTICE OF MOTION SEEKING
LEAVE TO FILE AMENDED
COMPLAINT PURSUANT TO
FED. R. CIV. P. 15(a)(2).**

PLEASE TAKE NOTICE that the undersigned, attorneys for the Plaintiffs, shall move the Court for an Order, granting leave to file an Amended Complaint in this matter pursuant to *Fed. R. Civ. P. 15(a)(2)*.

PLEASE TAKE FURTHER NOTICE that in support hereof, the undersigned shall rely upon the accompanying Declaration of Ronald A. Berutti, and a Brief.

PLEASE TAKE FURTHER NOTICE that oral argument is requested, and that a proposed form of Order accompanies this motion.

s/ Ronald A. Berutti

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July 5, 2022